

ENTERED

January 04, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

)	
In re:)	(Chapter 11) Subchapter V
)	
FREE SPEECH SYSTEMS, LLC,)	Case No. 22-60043 (CML)
)	
Debtor.)	
)	

**STIPULATION AND AGREED ORDER EXTENDING
THE DEADLINE TO OBJECT TO DISCHARGEABILITY**

The above-captioned debtor and debtor-in-possession (the “Debtor”), Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (the “Texas Plaintiffs”), David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach and Robert Parker (the “Connecticut Plaintiffs” and, together with the Texas Plaintiffs, the “Sandy Hook Families”) and the official committee of unsecured creditors in the chapter 11 case of Alexander E. Jones (together with the Debtor and the Sandy Hook Families, the “Parties”) hereby enter into this stipulation and agreed order (“Stipulation”) as follows:

WHEREAS, on July 29, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief under subchapter V of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”);

WHEREAS, on August 12, 2022, the Court entered the *Subchapter V Deadlines Order* [ECF No. 65], setting the deadline for the Debtor to file a plan of reorganization (the “Plan”) for October 27, 2022;

WHEREAS, on October 21, 2022, the Debtor filed its *Emergency Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 246], requesting an extension to file its Plan;

WHEREAS, on October 25, 2022, the Court entered the *Order Granting Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 254], which extended the deadline for the Debtor to file its Plan until December 16, 2022;

WHEREAS, on October 28, 2022, the Court entered the *Stipulation and Agreed Order* [ECF No. 260] extending the deadline to object to dischargeability pursuant to any potentially applicable law, including, but not limited to Bankruptcy Code section 523(c), to January 5, 2023;

WHEREAS, on December 6, 2022, the Debtor filed its *Second Emergency Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 299], requesting an extension of time to file its Plan;

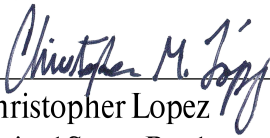
WHEREAS, on December 19, 2022, the Court entered the *Order Granting Second Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 332], which extended the deadline for the Debtor to file its Plan until February 17, 2022; and

WHEREAS, the Parties have agreed to a corresponding extension of the deadline to object to dischargeability pursuant to any potentially applicable law, including, but not limited to Bankruptcy Code section 523(c), and without agreeing to the applicability of same. The Parties expressly reserve their rights regarding same.

NOW, THEREFORE, IT IS STIPULATED BY THE PARTIES AND, UPON APPROVAL BY THE BANKRUPTCY COURT, ORDERED THAT:

1. The deadline to object to dischargeability pursuant to Bankruptcy Code section 523(c) and any other potentially applicable law is extended to March 10, 2023.

Signed: January 04, 2023



Christopher Lopez
United States Bankruptcy Judge

AGREED IN FORM AND SUBSTANCE:

Free Speech Systems, LLC

By: /s/ Raymond W. Battaglia

Raymond W. Battaglia

Law Offices of Ray Battaglia, PLLC

Counsel to the Debtor

The Texas Plaintiffs

By: /s/ Avi Moshenberg

Avi Moshenberg

McDowell Hetherington LLP

Counsel to the Texas Plaintiffs

-and-

Jarrold B. Martin

Chamberlain, Hrdlicka, White,

Williams & Aughtry, PC

Bankruptcy Counsel to the Texas Plaintiffs

**The Official Committee of Unsecured
Creditors of Alexander E. Jones**

By: /s/ David M. Zensky

David M. Zensky

Akin Gump Strauss Hauer & Feld LLP

Proposed Counsel to the Official Committee of

Unsecured Creditors of Alexander E. Jones

The Connecticut Plaintiffs

By: /s/ Alinor C. Sterling

Alinor C. Sterling

Koskoff Koskoff & Bieder PC

Counsel to the Connecticut Plaintiffs

-and-

Ryan E. Chapple

Cain & Skarnulis PLLC

Bankruptcy Co-Counsel to the Connecticut

Plaintiffs

-and-

Kyle J. Kimpler

Paul, Weiss, Rifkind, Wharton & Garrison

LLP

Bankruptcy Co-Counsel to the Connecticut

Plaintiffs

United States Bankruptcy Court
Southern District of Texas

In re:
Free Speech Systems LLC
Debtor

Case No. 22-60043-cml
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4

User: ADIuser

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Date Rcvd: Jan 05, 2023

Form ID: pdf002

Total Noticed: 16

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 07, 2023:

Recip ID	Recipient Name and Address
db	+ Free Speech Systems LLC, 3019 Alvin Devane Blvd. STE 300, Austin, TX 78741-7417
aty	Kyung Shik Lee, Shannon & Lee LLP, Pennzoil Place-Suite 1300, HOUSTON, TX 77027, UNITED STATES
aty	+ Shannon & Lee LLP, 700 Milam Street, STE 1300, Houston, TX 77002-2736
intp	+ Alex E Jones, c/o Jordan & Ortiz PC, 500 N Shoreline Blvd, Ste 900, Corpus Christi, TX 78401-0658
cr	+ David Wheeler, et al., c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-4653
cr	#+ Leonard Pozner, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	#+ Marcel Fontaine, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin, Suite 2700 Houston, TX 77002-6774
cr	#+ Neil Heslin, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	+ Reeves Law, PLLC, 702 Rio Grande St., Ste. 203, Austin, TX 78701-2720
cr	#+ Scarlett Lewis, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	+ Security Bank of Crawford, P.O. BOx 90, Crawford, Tx 76638-0090
cr	+ Travis County, c/o Jason A. Starks, P.O. Box 1748, Austin, TX 78767-1748
cr	#+ Veronique De La Rosa, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774

TOTAL: 13

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/PDF: acg.acg.ebn@aisinfo.com	Jan 05 2023 20:06:03	Ally Bank, c/o AIS Portfolio Services, LLC, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
cr	+ Email/Text: lemaster@slollp.com	Jan 05 2023 20:02:00	PQPR Holdings Limited, LLC, c/o Streusand Landon Ozburn & Lemmon LLP, attn: Stephen Lemmon, 1801 S. Mopac Expressway, Suite 320, Austin, TX 78746-9817
cr	^ MEBN	Jan 05 2023 19:58:57	Texas Comptroller of Public Accounts, Revenue Acco, Christopher J. Dylla, P.O. Box 12548, Austin, TX 78711-2548

TOTAL: 3

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr		ADP TotalSource, Inc.
intp		David Ross Jones
op		Marc Schwartz
op		Marc Schwartz
op		Schwartz Associates, LLC
op		Schwartz and Associates, LLC

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intp Shelby A Jordan
intp Sweetwater Holdings Group, Inc.
op W. Marc Schwartz

TOTAL: 9 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 07, 2023

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 4, 2023 at the address(es) listed below:

Name	Email Address
Avi Moshenberg	on behalf of Creditor Neil Heslin avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Creditor Scarlett Lewis avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Neil Heslin avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Scarlett Lewis avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Leonard Pozner avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Creditor Leonard Pozner avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Creditor Marcel Fontaine avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Veronique De La Rosa avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Creditor Veronique De La Rosa avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Marcel Fontaine avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Bradley J. Reeves	on behalf of Creditor Reeves Law PLLC bradley.reeves@pillsburylaw.com
Christina Walton Stephenson	on behalf of Debtor Free Speech Systems LLC Crissie.Stephenson@crowedunlevy.com elisa.weaver@crowedunlevy.com;ecf@crowedunlevy.com
Christina Walton Stephenson	on behalf of Interested Party Alex E Jones Crissie.Stephenson@crowedunlevy.com elisa.weaver@crowedunlevy.com;ecf@crowedunlevy.com
Christopher Dylla	on behalf of Creditor Texas Comptroller of Public Accounts Revenue Accounting Division bk-cdylla@oag.texas.gov, Sherri.Simpson@oag.texas.gov
Elizabeth Carol Freeman	on behalf of Trustee Melissa A Haselden liz@lizfreemanlaw.com

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	kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;JacksonWalkerLLP@jubileebk.net
Federico Andino Reynal	on behalf of Defendant Alex E. Jones areynal@frlaw.us
Federico Andino Reynal	on behalf of Defendant AEJ HOLDINGS LLC areynal@frlaw.us
Federico Andino Reynal	on behalf of Defendant AEJ TRUST 2018 areynal@frlaw.us
Federico Andino Reynal	on behalf of Defendant Free Speech Systems LLC areynal@frlaw.us
Ha Minh Nguyen	on behalf of U.S. Trustee US Trustee ha.nguyen@usdoj.gov
Jarrold B. Martin	on behalf of Creditor Marcel Fontaine jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Veronique De La Rosa jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Creditor Scarlett Lewis jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Neil Heslin jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Creditor Neil Heslin jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Leonard Pozner jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
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Jarrold B. Martin	on behalf of Creditor Leonard Pozner jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Marcel Fontaine jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Creditor Veronique De La Rosa jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jason Starks	on behalf of Creditor Travis County bkecf@traviscountytexas.gov
Jayson B. Ruff	on behalf of U.S. Trustee US Trustee jayson.b.ruff@usdoj.gov
John D Malone	on behalf of Creditor Security Bank of Crawford myra@johnmalonepc.com myra@johnmalonepc.com
Joseph S.U. Bodoff	on behalf of Creditor ADP TotalSource Inc. jbodoff@rubinrudman.com
Kyung Shik Lee	on behalf of Debtor Free Speech Systems LLC kslee50@gmail.com Courtnotices@kasowitz.com
Kyung Shik Lee	on behalf of Attorney Kyung Shik Lee kslee50@gmail.com Courtnotices@kasowitz.com
Marty L Brimmage	on behalf of Creditor Scarlett Lewis mbrimmage@akingump.com lmonreal@akingump.com;bkemp@akingump.com;apraestholm@akingump.com
Marty L Brimmage	on behalf of Creditor Veronique De La Rosa mbrimmage@akingump.com lmonreal@akingump.com;bkemp@akingump.com;apraestholm@akingump.com

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Marty L Brimmage	on behalf of Creditor Marcel Fontaine mbrimmage@akingump.com lmonreal@akingump.com;bkemp@akingump.com;apraestholm@akingump.com
Marty L Brimmage	on behalf of Creditor David Wheeler et al. mbrimmage@akingump.com, lmonreal@akingump.com;bkemp@akingump.com;apraestholm@akingump.com
Marty L Brimmage	on behalf of Creditor Leonard Pozner mbrimmage@akingump.com lmonreal@akingump.com;bkemp@akingump.com;apraestholm@akingump.com
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Richard A. Cochrane	on behalf of Creditor David Wheeler et al. rcocrane@akingump.com, jlangmack@akingump.com
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Ryan E Chapple	on behalf of Creditor David Wheeler et al. rchapple@cstrial.com, apretnice@cstrial.com
Shelby A Jordan	on behalf of Interested Party Shelby A Jordan cmadden@jhwclaw.com
Shelby A Jordan	on behalf of Interested Party Alex E Jones cmadden@jhwclaw.com
Stephen A Roberts	on behalf of Interested Party David Ross Jones sroberts@srobertslawfirm.com 1222805420@filings.docketbird.com
Stephen Wayne Lemmon	on behalf of Creditor PQPR Holdings Limited LLC lemmon@slollp.com, mates@slollp.com

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on behalf of Defendant PLJR HOLDINGS LIMITED LLC lemmon@slolp.com, mates@slolp.com

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on behalf of Defendant PLJR HOLDINGS LLC lemmon@slolp.com, mates@slolp.com

Stephen Wayne Lemmon

on behalf of Defendant PQPR HOLDINGS LIMITED LLC lemmon@slolp.com, mates@slolp.com

US Trustee

USTPRegion07.HU.ECF@USDOJ.GOV

Vickie L Driver

on behalf of Interested Party Alex E Jones Vickie.Driver@crowedunlevy.com
elisa.weaver@crowedunlevy.com;ecf@crowedunlevy.com

Walter J Cicack

on behalf of Interested Party Sweetwater Holdings Group Inc. wcicack@hcgllp.com, mallen@hcgllp.com

TOTAL: 69